

METROPOLITAN DADE COUNTY, FLORIDA



CONSUMER SERVICES DEPARTMENT
OFFICE OF CABLE TELEVISION COORDINATION
ROOM 901
140 WEST FLAGLER STREET
MIAMI, FLORIDA 33130-1564
(305) 375-3677
FAX (305) 375-4120

RECEIVED

FEB 11 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 10, 1993

FEB 11 1993

FEDERAL COMMUNICATIONS COMMISSION

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street NW
Washington, D.C. 20554

Re: Rule Making Reply Comments
MM Docket No. 92-266
Rate Regulation

Dear Ms. Searcy:

Transmitted for Metropolitan Dade County, Florida, please find an original and nine copies of our Reply Comments in the Cable Television Rule Making presently before the Federal Communications Commission in MM Docket No. 92-266.

Sincerely,

Cathy Grimes Peel
Cable Television Coordinator
Consumer Services Department
Metropolitan Dade County, Florida

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FEB 11 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FEB 11 1993

In the Matter of

Implementation of Sections of
the Cable Television Consumer
Protection and Competition
Act of 1992

Rate Regulation

MM Docket No. 92-266

TO: The Commission

REPLY COMMENTS OF METROPOLITAN DADE COUNTY

Metropolitan Dade County hereby submits these reply comments in the above-captioned proceeding. The Federal Communications Commission seeks comments on proposed rules to implement Sections 623, 612 and 622(c) of the Communications Act of 1934, as amended by Sections 3, 9 and 14 of the Cable Television Consumer Protection and Competition Act of 1992 ("1992 Cable Act").

Metropolitan Dade County is the local franchising authority for eight cable systems located within the County. Combined, those companies service over 350,000 Dade County households. The County has been the recipient of a significant number of complaints over the years regarding cable rates.

Metropolitan Dade County submitted initial comments in this proceeding, and has reviewed the comments filed by the

City of Miami Beach Florida. Metropolitan Dade County has also reviewed and strongly supports comments filed by the National Association of Telecommunications Officers and Advisors, the National League of Cities, the United States Conference of Mayors, and the National Association of Counties (collectively, the "Local Governments") in this proceeding.

Metropolitan Dade County agrees that the main goal of the Commission in implementing the above provisions in the 1992 Cable Act is to ensure that "consumer interests are protected in the receipt of cable service." Section 2(b)(4), 1992 Cable Act. The Commission should adopt regulations implementing Sections 623, 612 and 622(c) that enable local governments to work cooperatively with the Commission to ensure that cable subscribers receive the protections intended by the 1992 Cable Act. Such regulations should "seek to reduce the administrative burdens on subscribers, cable operators, franchising authorities, and the Commission." Section 623(b)(2)(A).

Among the comments and proposals by the Local Governments, and the City of Miami Beach, Metropolitan Dade County supports the following:

1. Current cable rates must be reduced if necessary to ensure that they are "reasonable," as required by Section 623. Congress clearly intended that cable rates be generally lower than those in effect on the date of enactment. Congress also intended that the Commission reduce existing rates if they are

not reasonable. Metropolitan Dade County agrees that the FCC has authority to roll back rates, and order refunds, for any rate found not reasonable.

2. This is particularly important in the case of cable operators that have increased rates since passage of the 1992 Cable Act. In this jurisdiction, five of eight systems have implemented rate increases (see Exhibit "A"), and a sixth will increase rates on April 1st. If the Commission finds that these rates are not reasonable, the Commission has the right and responsibility to correct the matter. The Commission must pay careful attention to situations where rate increases have accompanied re-tiering.

3. The Commission should permit local governments flexibility in establishing procedures and regulations for reviewing local basic cable rates, so long as such procedures and regulations are not irreconcilable with the certification requirements in Section 623(a)(3).

4. Section 623(b)(1) authorizes the Commission to regulate basic cable rates in franchise areas that are not certified to regulate rates. Our own comments speak in detail to this issue. This position is also articulated by the Local Governments and the City of Miami Beach. Metropolitan Dade County believes that the Commission is not only authorized, but obligated, to regulate basic service rates even in cases where a local franchising authority does not seek certification. At a minimum, the Commission should regulate basic rates in

situations where a franchising authority requests the Commission to regulate basic rates.

5. In order to reduce administrative burdens on the Commission, the Commission should permit, but not require, franchising authorities to initially review complaints that the rates for cable programming services are unreasonable under Section 623(c). We believe Congress intended that consumers have direct access to file complaints should they so choose. We agree with the City of Miami Beach that any complaint filed by a consumer to the FCC should simultaneously be supplied to the local franchising authority.

6. Given Congress' presumption that most cable operators are not subject to effective competition, the burden should be on cable operators to demonstrate that they are subject to effective competition. Franchising authorities should not bear the burden of demonstrating that cable operators are not subject to effective competition as a condition of certification to regulate rates. The FCC should assume that effective competition does not exist unless a cable operator can demonstrate otherwise. Metropolitan Dade County agrees with the Local Governments and the City of Miami Beach that the 15-percent penetration test for effective competition should be calculated individually, not cumulatively.

7. Related to the issue of effective competition, we have had an opportunity to review a copy of a local cable operator's Cable TV System Operator's Rate Structure

Questionnaire that was submitted to the FCC (see Exhibit "B"). It is clear from our review that the Commission must use caution in interpreting the information supplied in these questionnaires.

8. The above-mentioned submission indicates that competition from "nationwide TVRO programming suppliers" is available to 100% of the households in their area. However, the mere existence of satellite dish dealers or TVRO programming suppliers are insufficient to meet the requirements for effective competition. First, home dishes require a sizable up-front investment. Second, residents of multiple dwelling units do not have access to home dishes, and many housing developments restrict dishes as a matter of aesthetics. Third, TVRO programming suppliers are meaningless to those without dishes. Similarly, the submission indicates that the franchising authority in their area offers video programming to 50% of the households. In fact, neither Metropolitan Dade County nor any of the municipalities within this county operate cable systems. The submitter refers to the PEG channels offered via cable. We agree with the Local Governments that the Commission must not consider PEG as in any way "effective competition" consistent with congressional intent. The existence of PEG channels does not provide competition to cable, and are in fact dependent upon cable.

9. Metropolitan Dade County agrees with Local Governments that it is critical that the FCC determine

effective competition only in the cable operator's service area -- the area where the cable operator is actually providing cable service to households. A local example underscores the importance of this interpretation. In Dade County, most companies have a "franchise" area and a "service" area. The service area is just a portion of the larger geographic franchise area. In many cases, the larger franchise area overlaps those of other operators where the actual service areas do not overlap. This scenario became necessary as a result of "turf wars" in the early stages of cable construction to ensure the rapid and equitable deployment of cable services to all areas of the County. The larger franchise areas still exist on paper in the hopes they will provide a vehicle for the companies to engage in head-to-head competition with each other. Unfortunately, this has not occurred. Today each company operates in monopoly fashion in its own service area with no interest in expansion. To consider the larger franchise area when ascertaining the existence of effective competition would paint an inaccurate picture since the companies actually serve separate, adjacent areas.

10. It is not necessary for a franchising authority to have rate regulation language in its franchise. Franchising authorities may certify that they have the "legal authority" to regulate rates pursuant to home rule charters, their police powers, their right to regulate rights-of-way, or any other state or local provision which grants a franchising authority

the right to regulate a cable system. In addition, Section 632 (a)(2)(A) provides franchising authorities an independent source of power to regulate rates. A franchising authority's right to regulate rates under Section 623 also includes the right to order rate reductions if necessary to ensure that a cable operator receives only a "reasonable" rate for basic cable service.

11. The Commission should establish a "benchmark," rather than a "cost-of-service," model for regulating the rates for basic cable service and cable programming services. Such a method of regulation is consistent with Congress' desire that the Commission create a formula that is uncomplicated to implement, administer and enforce. The benchmark model should be based on rates charged by cable systems subject to effective competition. Finally, Metropolitan Dade County could support either a single national benchmark, a "zone of reasonableness" benchmark, but prefers, a matrix of benchmarks that takes into account system characteristics.

12. The rate for any installation and equipment used to receive basic cable service, regardless of whether such installation or equipment is also used to receive any other programming service, should be based on "actual cost" pursuant to Section 623(b)(3) -- thus subject to regulation by certified franchising authorities. In Metropolitan Dade County, one company charges \$104.95 for installation of a so-called "Broadcast Service" tier, which consists predominantly of local

channels, and charges \$42.00 for installation of "Standard Service" that includes broadcast and satellite channels (see Exhibit "C"). The disparity is clearly a disincentive to order reduced services. Actual cost basis is the best way to prevent such disparity, and is appropriate for regulation by certified franchising authorities. Congress did not intend that such rates be subject to regulation by the Commission pursuant to Section 623(c). Rates for equipment and installation charges should be considered separately from basic service, and unbundled. Additionally, cable operators should not now be allowed to charge for items that were previously supplied at no charge. Finally, additional outlet charges should also be based on "actual cost".

13. Metropolitan Dade County agrees with the Commission's conclusion that certification should be pursuant to a standardized and simple certification form similar to that located at Appendix D to the Notice of Proposed Rulemaking, but such form should be modified to eliminate the burden on local governments to demonstrate that a cable operator is not subject to effective competition.

14. As articulated in our comments, we agree that the time limits proposed in the NPRM are inadequate and unworkable. The 120-day period proposed by the Local Governments is consistent with our own position. We also support the additional time period of 90-days in the event a rate increase needs further review.

15. The Commission's rules implementing the subscriber bill itemization provision, Section 622(c), should allow a cable operator to itemize only direct costs attributable to franchise fees, PEG requirements or other assessments, and should require a cable operator that chooses to itemize costs to disclose other costs to the public reflected in the bill, such as a cable operator's profit, payments on a cable operator's debt service, or any other items a franchising authority believes are appropriate to itemize in order to accurately reflect the costs in a subscriber's bill. In calculating franchise costs pursuant to Section 623(b)(4) that a cable operator may itemize on his bill pursuant to Section 622(c), the Commission should make clear that such franchise costs are limited only to costs directly attributable to public, educational and governmental access requirements in a franchise. In addition, itemizations should be inclusive, not exclusive and added in to the bill separately. As discussed in our own comments, "add ons" misrepresent the amount of the actual bill paid by consumers. The same holds true for other itemizations that a company includes on the bill. One company in this County passes through a "copyright fee" by adding it to the bill.

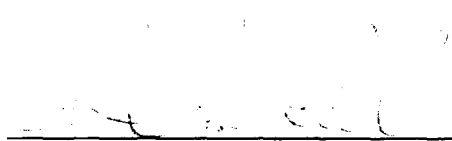
16. The Commission should permit franchising authorities that wish to do so to mediate leased access disputes, and to enforce the Commission's leased access rules. Such local enforcement would be in addition to the right of franchising

agreements regarding the placement and use of leased access channels.

17. The Commission's regulations should permit, but not require, communities to jointly regulate basic service rates. This issue is of importance in Dade County due to cable service areas that cross municipal boundaries. In addition, our two-tier form of government provides for dual jurisdiction (both County and municipal) in municipalities. Each municipality, and the County, should be permitted, but not required, to perform joint regulation. Alternatively, they should retain their right to perform independent regulation.

Metropolitan Dade County urges the Commission to adopt the above proposals and the other proposals raised in the Local Government's comments.

Respectfully Submitted,



Cathy Grimes Peel
Cable Television Coordinator

Metropolitan Dade County
Office of Cable Television
Coordination
Consumer Services Department
140 W. Flagler Street
Room 901
Miami, Florida 33130
(305)375-3677

February 10, 1993



Dynamic Cablevision of Florida, Ltd.
2151 W. 62nd Street
Hialeah, Florida 33016
305-558-2112

Dear Dynamic Cablevision Customer:

Day after day, Dynamic Cablevision strives to improve our quality customer service and programming options. This year was no exception.

- Dynamic Cablevision completed a million dollar state-of-the-art fiber optic upgrade to improve picture quality, channel capacity, and technical reliability.
- Dynamic's "Cable Plus" package was expanded to include The Sci-Fi Channel, Cartoon Network, Bravo, and Comedy Central, in addition to, the Sunshine Network and Sports Channel Florida, and will include expanded sports coverage of new teams such as the Florida Marlins and the Tampa Bay Lightning in 1993.
- We were honored with four ACE Awards, the highest received by any cable operator in the country, for our local programming.
- **CABLEVISION** magazine named Dynamic Cablevision's own Miavision as winner of the Innovator Award for local programming.
- We recently launched an optional digital music service, Digital Music Express (DMX). DMX provides uninterrupted digital music 24 hours per day that is hooked up to your own sound system.

In order to maintain and improve the high standards you deserve as our business and programming costs continue to increase, we must raise the rate of our Basic service level by \$.55 per month and our Basic Plus service level by \$.70 per month. If you subscribe to Cable Plus, this service level will increase by \$1.00 monthly. Initial installation rates for new subscribers will go up by \$10.00. These changes will be effective March 15, 1993.

We are pleased to announce that premium channels and additional outlets will remain at their current rates. These new price levels maintain Dynamic Cablevision as one of the lowest priced cable operators in Dade County for comparable service level offerings.

Thank you for subscribing to Dynamic Cablevision. We look forward to continue providing you with the finest programming available. Please tune in to Dynamic Cablevision's Prevue Guide (Channel 58) for up-to-the-minute programming listings.

Please be assured that we are committed to providing you courteous and responsive service, and at the same time, an excellent value.

Sincerely,
Dynamic Cablevision of Florida

COMMUNICATIONS

9825 S.W. 72nd Street
Miami, Florida 33173
(305) 595-0924

November 23, 1992

Ms. Cathy Grimes
Office of Cable Television Coordination
140 West Flagler Street #901
Miami, FL 33130

Dear Ms. Grimes:

On January 1, 1993, Dade Cable Television Inc., will increase its rates for Basic Service, Expanded Basic, and HBO. The amount of the increase is comparable to the increase in the cost of living for this region over the past year, plus increases in programming costs. Attached is a copy of the bill insert to our customers, who will be notified by December 1.

As you may know, on October 5, Congress passed cable legislation which, among other items, provides for local rate regulation. However, the rate regulation provisions of the '92 Cable Act do not become effective until April 3, 1993. Prior to that date, the current law, the rate regulation provision in the 1984 Cable Act, still applies. Also by April 3, the FCC must adopt procedures to implement rate regulation. While we do not know what will be adopted by the FCC, the Cable Act did give the FCC a few guidelines. Our rate increase is consistent with these guidelines.

Most of the provisions of the new law will not take effect until 1993. Many standards must be set by the FCC. Dade Cable Television, Inc. intends to abide by the provisions of the law; in fact, we are in compliance with most already. As the process of regulating the industry unfolds over the next months, we will keep you fully updated.

At this point, however, we have little additional information. I would be happy to meet with you at your convenience to answer what questions I can, and provide you with what materials I do have available. I will contact your office to set up an appointment.

Sincerely,

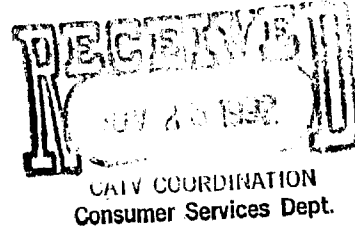
DADE CABLE TELEVISION, INC.



Maureen O'Neill
General Manager



Miami Tele-Communications, Inc.
A TCI COMPANY



November 23, 1992

Cathy Grimes
Cable TV Coordinator
140 W. Flagler Street, Room 109
Miami, Florida 33130

Dear Ms. Grimes:

On January 1, 1993, Miami Tele-Communications, Inc. will increase its rates for Basic Service, Expanded Basic Service and HBO. Basic Service will increase from \$19.95 to \$20.25 per month, and Expanded Basic Service will increase from \$2.35 to \$2.80 per month. Additionally, rates for HBO will be increased by \$0.45 per month. Attached is a copy of the bill insert to our customers, who will be notified by December 1. These inserts will be in both English and Spanish for the December and January bills.

As you know, on October 5, 1992 Congress passed cable legislation which among other items provides for local rate regulation. The rate regulation provisions of the 1992 Cable Act will become effective April 3, 1993. Prior to that date, the regulation provision in the 1984 Cable Act will apply. Miami Tele-Communications, Inc. intends to abide by the provisions of the new Act, and as the process of regulating the industry unfolds over the next several months we will keep you fully updated.

I would be happy to meet with you at your convenience to answer any questions or to discuss any concerns you may have regarding the new cable regulation or the January rate increase. Your input is always appreciated, as it is our intent to serve the Miami community in the best manner possible.

Sincerely,

Miami Tele-Communications, Inc.

Stuart Easterly
General Manager

Exhibit "A" (Page 3 of 6)

1306 Northwest Seventh Avenue
Post Office Box 911291 (Zip 33101-1291)
Miami, Florida 33136-2376
(305) 326-1514
FAX (305) 326-8711

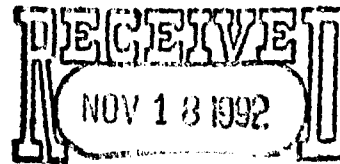
A TCI Company



GOLD COAST CABLEVISION

November 16, 1992

Cathy Grimes
CATV Coordinator
140 W. Flagler Street, #901
Miami, FL 33130



CATV COORDINATION
Consumer Services Dept.

Dear Ms. Grimes,

As I mentioned in my letter of October 21, 1992, most of the publicity surrounding the new cable television legislation has focused on the consumer's cost for cable services and the regulation of "Basic" rates by local franchising authorities. Because of this recent emphasis on the already sensitive subject of cable rates, I wanted to provide you advance notice regarding Gold Coast Cablevision's plans for pricing in the foreseeable future.

We are planning to mail notices to customers to advise them that of the following: 1) Standard Cablevision service (Channels 2-52 less premium channels) will increase to \$22.50/month; 2) The Movie Channel, Cinemax and Bravo will be adjusted to \$10.95/month; 3) a new level of "Basic" service is being introduced at \$11.00/month as a lower cost alternative, and 4) certain channels will be relocated to accommodate this new service.

Gold Coast Cablevision is committed to providing customers with the best of cable television programming with quality customer service to match. In keeping with this philosophy, it is our goal to continually add programming and improve the overall performance of our cable system.

Recently, at the request of subscribers, Gold Coast Cablevision added the Sunshine Network, Florida's largest regional sports network. This latest addition brings a total of eleven (11) new channels added to Gold Coast Cablevision over the past four years.

New and improving technologies have also enabled us to enhance and further improve cable television service. This past summer, Gold Coast Cablevision introduced pay-per-view sporting events, and will begin offering pay-per-view movies in 1993. In addition, state-of-the-art fiber optic cables are currently being installed as part of the cable distribution system. This enhancement will significantly improve signal reliability, and further reduce the number and duration of service interruptions.

Due to increased operating costs, especially in the areas of

programming and insurance, we will adjust selected service fees. Effective December 15, 1992, the monthly service charge for "Standard Cablevision" service (channels 2-52, less optional Premium Entertainment Channels) will increase to \$22.50 per month. In addition, The Movie Channel, Cinemax and Bravo will be adjusted to \$10.95 per month.

Increases in service rates, while necessary, can be particularly hard on our customers with low or fixed incomes. Because of this, Gold Coast Cablevision has chosen to offer a low-priced cable television service for customers that desire a limited programming selection. Therefore, effective December 29, 1992, a new "Basic" cable service will be available for a monthly service charge of \$11.00 per month. This new "Basic" cable service will consist primarily of Broadcast Television Stations and local originated programming. Should customers choose to upgrade to "Standard Cablevision" service, the additional monthly charge will be \$11.50. "Standard Cablevision" customers will automatically receive "Basic" as part of their service. (Monthly service charges are plus 6.5% state sales tax and 4% local franchise charge.)

In order to accommodate this new "Basic" cable service, it will be necessary to relocate the following cable channels:

<u>Channel</u>	<u>New Location</u>
WLTW-23 / Miami	9
Cable News Network	13
VH-1	23
Nickelodeon	24
USA Network	25
Gold Coast Information	30
WDZL-39 / Miami	31
WTBS-17 / Atlanta	32
WBFS-33 / Miami	33
MTV	51

As you may remember, Gold Coast Cablevision serves a small percentage of its subscribers with its reduced TV Ticket line-up. We are continuing to take steps to integrate these remaining customers to the main Gold Coast Cablevision system. As such, approximately 250 TV Ticket subscribers will have the following changes to their Basic service (channels 2-37, less premium channels); Jewish Federation Television/Sportstracker, Home Shopping Network, and The Weather Channel added and Video Hits 1 will replace Music Television. In light of additional programming and operating cost increases, we will adjust the basic rate for these customers to \$18.95.

As you may have heard, Congress recently passed legislation which, under certain circumstances, could result in regulation of cable television rates. The legislation itself does not specify how rates are to be regulated, although it mandates that the Federal Communications Commission study the issue and develop a "framework" for

rate regulation. FCC action on this matter is not expected before April 1993. Should the new regulations mandate a change in our rate structure, we will, of course, comply.

I would welcome your comments or questions regarding these changes and would be happy to meet with you. If you need to discuss these or any other issues, please feel free to call me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin D. Grossman", written over a circular stamp or seal.

Kevin D. Grossman
General Manager

SCHEDULE 4 CONTINUED

COMPETITION IN FRANCHISE AREAS

Line	Item:						
	<p>If you answered "Yes" on line 3, list the franchise areas which have competitors which offer similar services to at least 50% of households, the name of all such competitors in each franchise area and your estimate of the percentage of households in each franchise area to which each competitor offers similar services.</p> <table border="1"> <thead> <tr> <th>Name of franchise area in which a competitor offers similar service to at least 50% of households</th> <th>Name of all such competitors in each franchise area</th> <th>Percentage of households to which such competitors offer service</th> </tr> </thead> <tbody> <tr> <td>all franchise areas listed in schedule 1</td> <td>All nationwide TVRO programming suppliers *see attached for representative listing</td> <td>100% unless prohibited by local regulations or private covenants</td> </tr> </tbody> </table>	Name of franchise area in which a competitor offers similar service to at least 50% of households	Name of all such competitors in each franchise area	Percentage of households to which such competitors offer service	all franchise areas listed in schedule 1	All nationwide TVRO programming suppliers *see attached for representative listing	100% unless prohibited by local regulations or private covenants
Name of franchise area in which a competitor offers similar service to at least 50% of households	Name of all such competitors in each franchise area	Percentage of households to which such competitors offer service					
all franchise areas listed in schedule 1	All nationwide TVRO programming suppliers *see attached for representative listing	100% unless prohibited by local regulations or private covenants					
4							
	<p>Does a franchising authority offer video programming service to at least 50 percent of households in any franchise area served by this system? (Circle one.)</p> <p>5 <u>Yes</u>* No</p>						
	<p>If you answered "Yes" on line 5, list the franchise areas in which franchise authorities offer video programming services to at least 50% of households, the name of the franchise authority and your estimate of the percentage of households in the franchise area to which they offer services.</p> <table border="1"> <thead> <tr> <th>Name of franchise area in which franchise authority offers video programming</th> <th>Name of franchise authority</th> <th>Percentage of households</th> </tr> </thead> <tbody> <tr> <td>all franchise areas listed in schedule 1</td> <td>Dade County</td> <td>all subscribers to all cable systems in area receive such programming service</td> </tr> </tbody> </table>	Name of franchise area in which franchise authority offers video programming	Name of franchise authority	Percentage of households	all franchise areas listed in schedule 1	Dade County	all subscribers to all cable systems in area receive such programming service
Name of franchise area in which franchise authority offers video programming	Name of franchise authority	Percentage of households					
all franchise areas listed in schedule 1	Dade County	all subscribers to all cable systems in area receive such programming service					
6							

Line 5* Dade County provides video programming on three channels - available to all basic subscribers.

7

ADELPHIA CABLE TV RATES AND CHARGES

SOUTH DADE

NORTH DADE

KEY BISCAVNE

MONTHLY RATES:

	BEFORE FEES OR TAX	WITH FRANCHISE FEES	WITH SALES TAX	BEFORE FEES OR TAX	WITH FRANCHISE FEES	WITH SALES TAX	BEFORE FEES OR TAX	WITH FRANCHISE FEES	WITH SALES TAX
STANDARD SERVICE	\$23.95	\$25.15	\$26.78	\$23.95	\$25.15	\$26.78	\$23.95	\$25.15	\$26.78
BROADCAST SERVICE	\$10.00	\$10.50	\$11.18	\$10.00	\$10.50	\$11.18	\$10.00	\$10.50	\$11.18
SATELLITE SERVICE	\$13.95	\$14.65	\$15.60	\$13.95	\$14.65	\$15.60	\$13.95	\$14.65	\$15.60
BROADCAST ADDITIONAL OUTLETS (EACH)	\$1.50	\$1.58	\$1.68	\$1.50	\$1.58	\$1.68	\$1.50	\$1.58	\$1.68
ADDITIONAL OUTLETS (EACH)	\$4.00	\$4.20	\$4.47	\$4.00	\$4.20	\$4.47	\$4.00	\$4.20	\$4.47
FM OUTLETS (EACH)	\$4.00	\$4.20	\$4.47	\$4.00	\$4.20	\$4.47	\$4.00	\$4.20	\$4.47
VCR's (W/ MORE THAN 1 CONVERTER)	\$4.00	\$4.20	\$4.47	\$4.00	\$4.20	\$4.47	\$4.00	\$4.20	\$4.47
STANDARD REMOTE - W/NO PAY SERVICE	\$3.95	\$4.15	\$4.42	\$3.95	\$4.15	\$4.42	\$3.95	\$4.15	\$4.42
STANDARD REMOTE - W/ 1 PAY SERVICE	\$1.95	\$2.05	\$2.18	\$1.95	\$2.05	\$2.18	\$1.95	\$2.05	\$2.18
STANDARD REMOTE - W/2+ PAY SERVICES	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
AUDIO REMOTE - W/NO PAY SERVICE	\$4.95	\$5.20	\$5.54	N/A	N/A	N/A	N/A	N/A	N/A
AUDIO REMOTE - W/ 1 PAY SERVICE	\$2.95	\$3.10	\$3.30	N/A	N/A	N/A	N/A	N/A	N/A
AUDIO REMOTE - W/2+ PAY SERVICES	\$1.00	\$1.05	\$1.12	N/A	N/A	N/A	N/A	N/A	N/A
UNIVERSAL REMOTE - W/NO PAY SERVICES	\$5.95	\$6.25	\$6.66	\$5.95	\$6.25	\$6.66	\$5.95	\$6.25	\$6.66
UNIVERSAL REMOTE - W/1 PAY SERVICE	\$3.95	\$4.15	\$4.42	\$3.95	\$4.15	\$4.42	\$3.95	\$4.15	\$4.42
UNIVERSAL REMOTE - W/2+ PAY SERVICES	\$2.00	\$2.10	\$2.24	\$2.00	\$2.10	\$2.24	\$2.00	\$2.10	\$2.24
TV ENTERTAINMENT MAGAZINE	\$0.95	\$1.00	\$1.07	\$0.95	\$1.00	\$1.07	\$0.95	\$1.00	\$1.07
HOME BOX OFFICE	\$12.95	\$13.60	\$14.48	\$7.00	\$7.35	\$7.83	\$12.95	\$13.60	\$14.48
CINEMAX	\$9.95	\$10.45	\$11.13	\$7.00	\$7.35	\$7.83	\$9.95	\$10.45	\$11.13
THE MOVIE CHANNEL	\$9.95	\$10.45	\$11.13	\$7.00	\$7.35	\$7.83	\$9.95	\$10.45	\$11.13
SHOWTIME	\$9.95	\$10.45	\$11.13	\$7.00	\$7.35	\$7.83	\$9.95	\$10.45	\$11.13
PLAYBOY	\$9.95	\$10.45	\$11.13	\$7.00	\$7.35	\$7.83	\$9.95	\$10.45	\$11.13
THE DISNEY CHANNEL	\$7.95	\$8.35	\$8.89	\$7.00	\$7.35	\$7.83	\$7.95	\$8.35	\$8.89
PAY PER VIEW EVENTS	VARIES	VARIES	VARIES	N/A	VARIES	VARIES	VARIES	VARIES	VARIES
BULK SERVICE	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED

CONNECT & ONE TIME CHARGES

BROADCAST SERVICE	\$99.95	\$104.95	\$111.77	\$99.95	\$104.95	\$111.77	\$99.95	\$104.95	\$111.77
BROADCAST ADDITIONAL OUTLETS (EACH)	\$24.95	\$26.20	\$27.90	\$24.95	\$26.20	\$27.90	\$24.95	\$26.20	\$27.90
NEW CONNECT	\$40.00	\$42.00	\$44.73	\$40.00	\$42.00	\$44.73	\$40.00	\$42.00	\$44.73
RECONNECT	\$40.00	\$42.00	\$44.73	\$40.00	\$42.00	\$44.73	\$40.00	\$42.00	\$44.73
RELOCATE OUTLET (EACH)	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
UP GRADE (W/TRIP)	\$9.95	\$10.45	\$11.13	\$9.95	\$10.45	\$11.13	\$9.95	\$10.45	\$11.13
DOWN GRADE (W/TRIP)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CHANGE OF SERVICE (W/TRIP)	\$9.95	\$10.45	\$11.13	\$9.95	\$10.45	\$11.13	\$9.95	\$10.45	\$11.13
UP GRADE (ADDRESSABLE)	\$5.00	\$5.25	\$5.59	\$5.00	\$5.25	\$5.59	\$5.00	\$5.25	\$5.59
DOWN GRADE (ADDRESSABLE)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
CHANGE OF SERVICE (ADDRESSABLE)	\$5.00	\$5.25	\$5.59	\$5.00	\$5.25	\$5.59	\$5.00	\$5.25	\$5.59
ADDITIONAL OUTLET EA(>2 @ INITIAL INSTALL)	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
FM SERVICE (PER OUTLET)	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
VCR'S (STD HOOK-UP SEPERATE TRIP)	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
A/B SWITCH MATERIAL (PER SWITCH)	\$20.00	\$21.00	\$22.37	\$20.00	\$21.00	\$22.37	\$20.00	\$21.00	\$22.37
A/B SWITCH LABOR (SEPERATE TRIP)	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
CUSTOM INSTALL ADDITIONAL (EACH OUTLET)	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
TRIP CHARGE	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77	\$15.00	\$15.75	\$16.77
UNRETURNED OR LOST CONVERTER	\$175.00	\$175.00	\$186.38	\$175.00	\$175.00	\$186.38	\$175.00	\$175.00	\$186.38
UNRETURNED OR LOST HANDHELD UNIT	\$25.00	\$25.00	\$26.63	\$25.00	\$25.00	\$26.63	\$25.00	\$25.00	\$26.63
DAMAGED CONVERTER (COST UP TO)	\$175.00	\$175.00	\$186.38	\$175.00	\$175.00	\$186.38	\$175.00	\$175.00	\$186.38
DAMAGED HANDHELD UNIT (COST UP TO)	\$25.00	\$25.00	\$26.63	\$25.00	\$25.00	\$26.63	\$25.00	\$25.00	\$26.63
LATE CHARGE	\$3.00	\$3.00	\$3.00	\$3.00	\$3.00	\$3.00	\$3.00	\$3.00	\$3.00
RETURN CHECK CHARGE	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00	\$10.00
MULTIPLE DWELLING UNITS	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED
PREWIRING	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED	NEGOTIATED

1. RATES & CHARGES ARE SUBJECT TO PROMOTIONAL DISCOUNTS AT ADELPHIA'S DISCRETION.

2. A FIVE PERCENT (5%) FRANCHISE FEE IS CHARGED ON MOST RATES AND CHARGES.

3. A SIX & ONE HALF PERCENT (6.5%) USE TAX IS CHARGED ON ALL RATES AND CHARGES EXCEPT DEPOSITS.

eff. 7/1/92

Exhibit "C"